

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>EUGENE CHARLES CONRAD</b>	:	<b>CASE NO. 1:20-bk-03513-HWV</b>
<b>CRYSTAL M. CONRAD</b>	:	
<b>Debtors</b>	:	<b>CHAPTER 13</b>
	:	
<b>JACK ZAHAROPOULOS, ESQUIRE</b>	:	
<b>STANDING CHAPTER 13 TRUSTEE</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>EUGENE CHARLES CONRAD</b>	:	
<b>CRYSTAL M. CONRAD</b>	:	
<b>Respondent</b>	:	

**DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO MODIFY PLAN**

**AND NOW**, come Debtors, Eugene Charles Conrad and Crystal M. Conrad, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. Further, Debtors filed an Amended Schedules I and J listing disposable income of \$3,398.42. However, the amount being withheld from Eugene Conrad's pay check for withholding for insurance will increase by \$230.45 effective January of 2025. Accordingly, Debtors believe and hereby aver that their disposable income is \$3,167.97.
5. Admitted. For further response, see Debtors' Amended Schedule I, which was filed today.
6. Admitted. Further, Debtors have no opposition to an increase in their Plan payments to \$3,167.97 effective November 2025.

7. Admitted.
8. Denied. See response to paragraph 7.
9. Denied. See response to paragraph 7.

**WHEREFORE**, Debtors respectfully request that this Honorable Court issue an Order denying the Trustee's Motion to Modify Plan.

Respectfully submitted,



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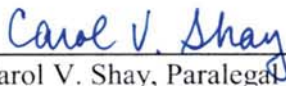
DATED: 11-18-24

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO MODIFY PLAN upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

  
\_\_\_\_\_  
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DATED: 11/18/2024